US EPA RECORDS CENTER REGION 5
513056

E.6
8/17/98

A.E. STALEY MANUFACTURING COMPANY 2200 E. ELDORADO STREET DECATUR, ILLINOIS 62525 TELEPHONE 217/423-4411

August 17, 1998

Ms. Beth A. Henning
Emergency Response Branch
U.S. Environmental Protection Agency
77 West Jackson Boulevard (SE-5J)
Chicago, Illinois 60604-3590

Re: A.E. Staley Manufacturing Company
Request for Information Pursuant to Sections 308 and 311 of the Clean Water Act

Dear Ms. Henning:

Enclosed and submitted by A.E. Staley Manufacturing Company is the Response to Request for Information Pursuant to Sections 308 and 311 of the Clean Water Act.

Should you have any questions, please contact me.

Very truly yours,

Marc W. Larson
Corporate Counsel

MWL/me

RESPONSE TO INFORMATION REQUEST

A. E. Staley Manufacturing Company
Decatur Plant
2200 Eldorado Street
Decatur, Illinois

August 17, 1998

1. A discharge of liquid sulfuric acid occurred at A.E Staley Manufacturing Company's ("Staley") Decatur, Illinois plant (the "Plant") on June 20-21, 1998. Details of the discharge are as follows:

   A. Approximately 72,000 pounds of liquid sulfuric acid (93% by weight), CAS #7664-93-9, leaked from a two-inch hose used in transferring the acid from a tank truck to the Plant's starch process A copy of the Material Safety Data Sheet for the liquid sulfuric acid is attached as Document No. 1. Of the 72,000 pounds originally spilled, remediation efforts were able to neutralize an estimated 35.2% of the spill prior to leaving the Plant. The final estimated amount of the discharge was 47,646 pounds. The duration of the discharge is unknown. The release was discovered at 9:50 p.m. on June 20, 1998. The valve on the tank truck controlling the flow of liquid sulfuric acid was closed at 9:51 p.m., stopping the release from the truck. Since the initial failure of the hose was not immediately detected, the duration of the discharge cannot be determined with any accuracy. By 3.30 a.m., June 21, 1998, testing at the Moser Lane Outfall showed that the liquid sulfuric acid had been neutralized.

   B. The specific source of the discharge was a two-inch hose used in transferring the acid from a tank truck to the Plant's starch process. A failure of the hose was the cause of the leak.

   C. The areas affected by the discharge include an unnamed tributary and a ditch which has long been called the Staley Hot Water Ditch. There was no damage to either public or private property. The Illinois Department of Natural Resources (IDNR) has indicated that 2,488 fish were killed (approximately 2,000 pounds), and these were valued at $1,312.48. An additional $712.72 of expenses was incurred by IDNR.

   D. No evacuations or closings were necessary as a result of the discharge

E. A description of the response efforts is contained in the Sulfuric Acid Release Report (the "Report"), a copy of which is attached as Document No. 2. This document was prepared in connection with an Incident Review Meeting dated June 21, 1998. The Report lists Staley personnel at the Plant involved in the clean-up. Additionally, Staley paid Bodine Services Inc. ("Bodine") $4,925.80 for 171 man-hours of labor spent on the clean-up. Staley paid Bodine $3,800 for the use of equipment for the clean-up, which included three vacuum-pump trucks and related equipment. Staley added 17,560 pounds of soda ash to neutralize the liquid sulfuric acid, at an estimated cost of $6,300.

F. A large amount of the liquid sulfuric acid was either recovered or neutralized by using soda ash before it reached navigable waters. Staley determined that the equivalent of 3,243 pounds of liquid sulfuric acid was recovered at the Plant's Number 2 clarifier. An additional 21,111 pounds of liquid sulfuric acid was neutralized by the addition of 10,560 pounds of liquid soda ash which was added to the drainage system and by the addition of 7,000 pounds of dry soda ash at the Moser Lane Outfall. What was not neutralized was diluted in the waters of the Staley Hot Water Ditch.

2. Approximately 72,000 pounds of liquid sulfuric acid (93% by weight), CAS #7664-93-9, leaked from a tank truck. Of the 72,000 pounds originally spilled, remediation efforts were able to neutralize an estimated 35.2% of the spill prior to leaving the Plant. The final estimated amount of the discharge into the Staley Hot Water Ditch was 47,646 pounds. The remainder was recovered and neutralized.

3. NPDES Permit No. IL0002381 is the only permit that relates to a discharge into Lake Decatur. A copy is attached as Document No. 3.

4. The attached Document No. 4 contains the analytical data (pH testing) for samples taken in connection with the discharge. No samples have been preserved or retained.

5. All of the reports and studies regarding the discharge are attached to this Response. Included are Document No. 2, Document No 4, Document No. 5 and Document No. 6.

6. Attached as Document No. 5 is a June 22, 1998 letter from Jane Barnett, Manager, Environmental and Safety to the Illinois Emergency Management Agency.

Attached as Document No. 6 is an August 6, 1998 letter to Staley from the Illinois Environmental Protection Agency.

7. Maps of the relevant areas of the discharge are attached. Document No. 7 is a map of part of Decatur, Illinois, showing the relationship between Staley property (outlined in yellow) and Lake Decatur. Document No. 8 shows the west end of the Plant. The blue dot indicates where the liquid sulfuric acid spilled, and the yellow line shows the path of the liquid sulfuric acid. Document No. 9 shows the east end of the Plant. The yellow line shows the path of the liquid sulfuric acid, and the writing shows the location of the vacuum pump trucks and the diking made with soda ash. Document No. 10 shows the property leading from the Moser Lane Outfall to Lake Decatur, including passing through the property referred to as the Staley Hot Water Ditch.

8. Currently, monitoring is done at the Moser Lane Outfall, which, as indicated on the maps provided in response to Request No. 6, is located on Staley property The Moser Lane Outfall is not located at the point where Staley property intersects with Lake Decatur. Monitoring at the Moser Lane Outfall includes taking daily samples and samples after rain events. The samples are tested both internally and at an external lab for the following: BOD, pH, Total Suspended Solids, Oil and Grease and Flow. Attached as Documents 11, 12, and 13 respectively are the NPDES Discharge Monitoring Reports for May 1998, June 1998, and July 1998.

9. There was one other discharge, which occurred on December 26, 1997. Details of the discharge are as follows (numbered 2-8 in response to the Request for Information):

    2. Approximately 600 gallons of 50% NaOH solution were released to the Plant's storm sewer system. This released material contaminated approximately 600,000 gallons of storm water that was detained by a storm water check dam located in the sewer. During the subsequent 62 hours, roughly 100,000 gallons of high pH storm water overflowed the storm sewer check dam and were discharged to Lake Decatur. Another 500,000 gallons were diverted to the Staley Lake (an onsite fire water reservoir) to prevent further contamination of Lake Decatur. This was accomplished by pumping the remaining high pH storm water detained by the check dam into an overland drainage channel that feeds Staley Lake. Based on this information, it is estimated that 720 pounds of sodium hydroxide were discharged to the Moser Lane sewer and then to Lake Decatur. The remaining 3110 pounds of sodium hydroxide were diverted to Staley Lake where they were diluted and neutralized.

3. See the response to Request No. 3.

4. Attached as Document No. 14 is a Waste Treatment Report concerning this matter. No samples have been preserved or retained.

5. All of the reports and studies regarding the discharge are attached to this Response. Included are Document No. 14, Document No. 15 and Document No. 16.

6. Attached as Document No. 15 is a January 7, 1998 letter to Staley from the Illinois Environmental Protection Agency. Attached as Document No. 16 is a January 23, 1998 letter from Derek Paszkiewicz, Utility Production Manager to the Illinois Environmental Protection Agency.

7. Maps of the relevant areas of the discharge are attached. Document No. 7 is a map of part of Decatur, Illinois, showing the relationship between Staley property (outlined in yellow) and Lake Decatur. Document No. 8 shows the west end of the Plant. The pink dot indicates where the NaOH solution spilled, and the red line shows the path of the NaOH solution until it reaches the yellow line, and the yellow line continues to show the path of the NaOH solution. Document No. 9 shows the east end of the Plant, and the yellow line shows the path of the NaOH solution. The yellow line on Document No. 10 shows the path of the NaOH solution from the Moser Lane Outfall to Lake Decatur.

8. See the response to Request No. 8.

10. The Plant began operating at this location in 1912.

11. A. No.

B. Yes.

C. Yes.

D. Approximately 25,000 gallons.

E. The Plant has a Spill Prevention, Control and Countermeasures Plan. A copy of the certification of the Plan by Professional Engineer Lynn W. Elder and full approval of the Plan by Plant Manager Michael J.

Slimbarski is attached as Document No. 17. No amendments to the Plan have been made as required by 40 C.F.R. § 112.4.

12 A. No.

B. No.

C. Not applicable.

The following documents were consulted, examined or referred to in the preparation of these answers:

1. Document No. 1, Document No. 2, Document No. 5, Document No. 6.
2. Document No. 1.
3. Document No. 3.
4. Document No. 4
5. Document No. 2, Document No. 4, Document No. 5.
6. Document No. 5, Document No. 6.
7. Document No. 7, Document No. 8, Document No. 9, Document No. 10
8. Document No. 11, Document No. 12, Document No. 13
9. Document No. 7, Document No. 8, Document No. 9, Document No. 10, Document No. 14, Document No. 15, Document No. 16.
10. The Kernel and The Bean: The 75-Year Story of the Staley Company, by Dan J. Forestal, copyright 1982.
11. Document No. 17.
12. No documents.

The following persons assisted in the preparation of these answers: Jane B. Barnett, Manager, Environmental & Safety; Marc W. Larson, Corporate Counsel, Ben I. McBride, Area Manager, Utilities; and Michael J. Slimbarski, Plant Manager.

VERIFICATION

STATE OF ILLINOIS)
) SS.
COUNTY OF MACON)

The undersigned, Marc W. Larson, states that he is Assistant Secretary and Corporate Counsel of A. E. Staley Manufacturing Company, the above-named respondent, that he is authorized to make this verification for and on its behalf, and that he is informed and believes and on that ground alleges that the matters stated above are true and accurate to the best of the knowledge of A. E. Staley Manufacturing Company.

Marc W. Larson

Subscribed and sworn to
before me this 17th day
of August, 1998.

Notary Public

"OFFICIAL SEAL"
Chris E. Livergood
Notary Public, State of Illinois
My Commission Expires 6/21/02

Document No. 1

MATERIAL SAFETY DATA SHEET

J.T.Baker CHEMICALS

J. T. Baker Chemical Co., 222 Red School Lane, Phillipsburg, N.J. 08865

CHEMICAL NAME

SECTION I - IDENTIFICATION OF PRODUCT

CHEMICAL NAME	FORMULA
Sulfuric Acid	H_2SO_4
SYNONYM OR CROSS REFERENCE Oil of Vitriol, Oleum	CAS NO: 7664-93-9

SECTION II - HAZARDOUS INGREDIENTS

MATERIAL	NATURE OF HAZARD

SECTION III - PHYSICAL DATA

BOILING POINT	MELTING POINT -34 to -21°F.
VAPOR PRESSURE Low	SPECIFIC GRAVITY 1.56-1.84
VAPOR DENSITY (AIR=1) 3.40	PERCENT VOLATILE BY VOLUME (%)
WATER SOLUBILITY Complete	EVAPORATION RATE (_____= 1)

APPEARANCE
Oily liquid

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (method used) =	FLAMMABLE LIMITS	Lower	Upper

FIRE EXTINGUISHING MEDIA: Suitable dry chemical

SPECIAL FIRE-FIGHTING PROCEDURES: Do not use water to put out fire if the water can get into concentrated sulfuric acid. In case of fire next to sulfuric acid tank, use respiratory protection against fumes.

UNUSUAL FIRE AND EXPLOSION HAZARD: Reacts violently with water and organic materials with evolution of heat.

SECTION V - HEALTH HAZARD

THRESHOLD LIMIT VALUE
1 mg/M^3 orl-rat LD_{50}: 2140 mg/kg

HEALTH HAZARDS
Causes severe burns.

FIRST AID PROCEDURES: In case of contact, immediately flush eyes or skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Call a physician. If swallowed, do not give emetics; if conscious, give tap water, milk, or

CHEMICAL NAME

SECTION V - REACTIVITY DATA

STABILITY	UNSTABLE		CONDITIONS TO AVOID Avoid adding water to the acids since large amount of heat is produced.
	STABLE	X	

INCOMPATABILITY (materials to avoid)

Highly corrosive. May set fire to wood or cellulose.

HAZARDOUS DECOMPOSITION PRODUCTS

HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID
	WILL NOT OCCUR	X	

SECTION VI - SPILL AND DISPOSAL PROCEDURES

SPILLS

Cover the contaminated surface with sodium bicarbonate or a soda ash-slaked lime mixture (50-50). Mix and add water if necessary to form a slurry. Scoop up slurry. Alternatively use J.T.Baker's Neutrasorb® (Product No. 4456).

DISPOSAL

Dispose through a waste treatment plant if local environmental regulations permit.

SECTION VII - PROTECTION INFORMATION

RESPIRATORY PROTECTION (specify type)

Self-contained breathing apparatus.

VENTILATION	LOCAL	X	SPECIAL
	MECHANICAL (general)	X	OTHER

PROTECTIVE GLOVES Rubber gloves	EYE PROTECTION

OTHER PROTECTIVE EQUIPMENT

Approved working clothes (have a body shield available) and rubber boots.

SECTION IX - HANDLING AND STORAGE PRECAUTIONS

STORAGE & HANDLING

Do not allow water to get into container because of violent reaction.
Keep in tightly closed container. Loosen closure cautiously.

SECTION X - MISCELLANEOUS INFORMATION

Do not get in eyes, on skin, on clothing. Avoid breathing vapor. Wash thoroughly after handling.

Date Issued: _____

Approved by R. M. Mitchell
Manager, Quality Assurance

Revision No. & Date Issued: _____

The information provided in this Material Safety Data Sheet has been compiled from our experience and data presented in various technical

Document No. 2

Sulfuric Acid Release

June 20, 1998

At approximately 9:50 PM on Saturday, June 20 Don Queary (Starch Shift Coordinator) reported finding an acid spill at the temporary sulfuric acid storage area in dry starch. The loss was later calculated to be 4700 gallons. The acid went into the storm sewer DI94 and subsequently to the Moser Lane storm sewer run-off ditch that leads to Lake Decatur. There were no injuries to Staley employees, contract employees, or other personnel.

An Incident Review Meeting was held on Sunday, June 21 at 7:00 PM with the following people in attendance.

Mike Slimbarski	Decatur Plant Manager
Marc Larson	Staley Attorney
Jane Barnett	Manager of Safety & Environmental
Ben McBride	Utilities Manager
Tim Schmidt	Plant Coordinator
Keith Purcell	Utilities Shift Coordinator
Don Queary	Starch Shift Coordinator

Background

Sulfuric Acid is used in the starch modification process to thin batches and/or to neutralize the ethylene oxide modifier. Under normal circumstances tank trucks of 66 Baume sulfuric acid are unloaded into a 9000 gallon polyethylene storage tank that is within a diked area. However, on the night of June 16 the sulfuric acid storage tank developed a leak. The leak was not immediately repairable and a tank of alternate construction material was being investigated. In the mean time, Lucky Trucking provided two tank trucks to be used as temporary storage. These tanks were put into service using a procedure previously developed during a similar leak in the primary storage tank. These procedures included covering the area sewers with Zammy mats.

There are two ways that surface water can exit the plant and get to Lake Decatur. Under normal dry conditions, a 30 " system with a lift station takes the ground water and drainage into Staley Lake and then the overflow from Staley Lake flows through Moser Land and into Lake Decatur. However, in the event of continued and significant rainfall, a valve is opened that directs flow under Staley Lake through a 60" main. With the large amount of rain that we have had over the past several weeks, the flow through the system had remained high and the line to the 60" sewer remained open. That was the case during this incident.

Sequence of Events

9:50 PM

In the normal course of business Don Queary (Starch Shift Coordinator) walked by the temporary acid system and saw acid leaking from the north tank truck through a broken hose. The hose was split. Don called Jeff Nihiser (Starch 7 Bldg. Rover), and the plant coordinator (Tim Schmidt). Don and Jeff shut the acid valve at the tank to stop the flow and began to neutralize the area with soda ash. Jeff contacted the waste treatment operator (Kenny Gilmore). A Zammy mat had been previously placed over the sewer as part of the standard procedure.

9:55 PM

Keith Purcell (Waste Treatment Supervisor) and Tim Schmidt arrive on the scene. Ben McBride (Utilities Manager) is called. The three supervisors attempt to estimate the quantity. The waste treatment operator is dispatched to the Moser Lane outfall to observe and begin testing.

10:00 PM

Mike Slimbarski (Plant Manager) is called. Keith Purcell attempts to close the valve to the 60" storm sewer, but the valve will not close.

10:20 PM

The waste treatment operator takes a sample of the Moser Lane outfall and determines the pH to be 1.4.

10:30 PM

Tim Schmidt contacts the Bodine sewer service in the plant to begin containment. Soda ash is taken to the Moser Lane outfall to begin to dam the outfall.

10:35 PM

Jane Barnett (Manager of Safety & Environmental) is called.

10:40 PM

Based upon the pH reading and unknown quantity of the spill, Keith Purcell and Tim Schmidt decide to initiate the emergency response procedure. The National Response Center, Illinois ESDA, and Macon County ESDA are called. Since there was no answer at Macon County ESDA except for an answering machine, Keith called the Macon County Sheriff Department.

10:50 PM

Soda ash dike at Moser Lane outfall was built to contain the spill. Liquid soda ash was being procured in the plant to neutralize the area behind the dike and the outfall (called the lagoon).

11:09 PM

Illinois EPA called into the plant via telephone. Keith Purcell answered the call. The person calling in wanted to know if the spill was going to a body of water. The person instructed us to contain the material, draw it out back into our system and then flush the remainder to the lake.

11:24 PM

Phillip Anello (Macon County ESDA) called into the plant.

11:30 PM

Bodine truck arrives at the lagoon. Dumps a load of soda ash into the lagoon, and removes a truck load of neutralized material from the lagoon.

11:34 PM

Phillip Anello arrives at the plant. He concurs with our procedures and activities.

11:45 PM

The soda ash dike at the Moser Laner outfall appears to be deteriorating. Zammy mats are thrown over the bags to protect the bags. Very little flow going to the lake at this time, but it is increasing. Tim Schmidt activates a call to Bodine Environmental Service, telling them that we need two more trucks and 8 or 9 more people.

12:00 AM Sunday

Keith tests the hot water ditch at Lake Decatur. pH is 7.4.

12:45 AM

Mike Slimbarski arrives at the plant. Bodine pump trucks are on site. Ben McBride has them put gathered liquid material into #2 clarifier. The one remaining truck is dumping liquid soda ash into the outflow of the Moser Lane weir,

2:00 AM

pH at the entry to the hot water ditch is 3.4. pH of the lake closest to our property is 6.8. Mike Slimbarski notifies Pat Mohan, Mike McFate, and John Doxsie of the situation, following the procedure for major emergencies.

2:35 AM

Ben McBride arrived on the site. By this time there was a major rain event and flow to the Moser lane weir was increasing. By this time we had hauled 6 tank truck loads of low pH material to the clarifier.

2:45 AM

Use of the tank trucks to remove low pH material from the weir area is called off due to the volume of flow. The trucks were then used to haul soda ash to the discharge of the weir to neutralize the discharge into the lake.

3:05 AM

pH at the lagoon is 7.4.

3:30 AM

pH at the outfall is 9.2, meaning that all the acid has been neutralized from Staley lake back to the process.

4:30 AM

Keith Purcell continued to sample the hot water ditch from the weir to the lake. The pH entering the lake was 7.5. In a still pool just across the fence line from the fire house, the pH of the water was 1.1, however in the stream flowing adjacent to the pool the pH was 7.6.

Phillip Anello was consulted on how to deal with the water in the pool, and after reviewing the alternatives determined that it should be flushed through to the lake.

5:00 AM

Anello leaves. The stream south of Williams street is at a pH of 7.4. We begin hourly sampling of the weir, stream, and lake. The emergency is delared to be over.

Further Consequences

Although not evident the night of the incident, there was a fish kill in the lagoon leading to Lake Decatur. On Sunday there were less than 100 fish involved, but by Monday morning there were considerable more. No fish were killed in the lake, proper. All fishe were killed in the lagoon that was on Staley property. At the time of the writing of this report, the fish were still being counted.

Conclusion

The temporary sulfuric acid system had been used on two previous occasions without incident. However, in this incident a hose broke. The hose has been secured and the material of construction is being investigated. Prior to the final report, we will be able to determine whether this was the proper hose for the application.

The response to the incident followed all proper procedures and the procedure had been updated in 1997. All communication was handled properly and in a timely basis.

Three immediate actions will be taken:

1. All hoses on the temporary system will be inspected and certified as correct for handling sulfuric acid.
2. The area immediately adjacent to the temporary system will be isolated from the storm sewer system.

3. The valve allowing for diversion of the storm water run off into Staley Lake will be immediately repaired.

This was a very serious incident, putting personnel at risk of acid exposure and causing a fish kill in the Staley lagoon. The entire incident will be reviewed at all levels within the Decatur plant.

Document No. 3

NPDES Permit No. IL0002381

Illinois Environmental Protection Agency

Division of Water Pollution Control

2200 Churchill Road

P.O. Box 19276

Springfield, Illinois 62794-9276

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Reissued (NPDES) Permit

Expiration Date: August 31, 1999

Issue Date: August 28, 1996
Effective Date. September 1, 1996

Name and Address of Permittee:

A E. Staley Manufacturing Company
2200 East Eldorado Street
Decatur, Illinois 62525

Facility Name and Address:

A. E. Staley Manufacturing Company
2200 East Eldorado Street
Decatur, Illinois 62525
Macon County

Discharge Number and Name:

001 Stormwater and Groundwater
002 Stormwater

Receiving Waters:

Lake Decatur
Lake Decatur

In compliance with the provisions of the Illinois Environmental Protection Act, Subtitle C and/or Subtitle D Rules and Regulations of the Illinois Pollution Control Board, and the Clean Water Act, the above-named permittee is hereby authorized to discharge at the above location to the above-named receiving stream in accordance with the standard conditions and attachments herein.

Permittee is not authorized to discharge after the above expiration date. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit the proper application as required by the Illinois Environmental Protection Agency (IEPA) not later than 180 days prior to the expiration date.

Thomas G. McSwiggin, P.E.
Manager, Permit Section
Division of Water Pollution Control

TGM:DEL\95100602.PSJ

NPDES Permit No. IL0002381

Effluent Limitations and Monitoring

PARAMETER	LOAD LIMITS lbs/day DAF (DMF) 30 DAY AVG.	DAILY MAX.	CONCENTRATION LIMITS mg/l 30 DAY AVG.	DAILY MAX.	SAMPLE FREQUENCY	SAMPLE TYPE
1. From the effective date of this permit until the expiration date of this permit, the effluent of the following discharge(s) shall be monitored and limited at all times as follows:						
Outfall(s): 001 Stormwater Runoff and Groundwater***						
Flow	See Special Condition 1				Measure when monitoring	
pH	See Special Condition 2				Weekly	Grab
BOD_5	*	*	*	*	Weekly	Composite
Total Suspended Solids	*	*	*	*	Weekly	Composite
Oil and Grease	*	*	*	*	Weekly	Grab

*See Special Condition 4.
***See Special Conditions 4 and 6.

Outfall(s): 002 Stormwater Runoff**

**See Special Condition 3.

NPDES Permit No. IL0002381

Special Conditions

SPECIAL CONDITION 1: Flow shall be reported as a monthly average and a daily maximum.

SPECIAL CONDITION 2: PH shall be in the range of 6.0 to 9.0 at all times.

SPECIAL CONDITION 3:

STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

A. A storm water pollution prevention plan shall be developed by the permittee for the storm water associated with industrial activity at this facility. The plan shall identify potential sources of pollution which may be expected to affect the quality of storm water discharges associated with the industrial activity at the facility. In addition, the plan shall describe and ensure the implementation of practices which are to be used to reduce the pollutants in storm water discharges associated with industrial activity at the facility and to assure compliance with the terms and conditions of this permit.

B. The plan shall be completed within 180 days of the effective date of this permit. Plans shall provide for compliance with the terms of the plan within 365 days of the effective date of this permit. The owner or operator of the facility shall make a copy of the plan available to the Agency at any reasonable time upon request. [Note: If the plan has already been developed and implemented it shall be maintained in accordance with all requirements of this special condition.]

C. The permittee may be notified by the Agency at any time that the plan does not meet the requirements of this condition. After such notification, the permittee shall make changes to the plan and shall submit a written certification that the requested changes have been made. Unless otherwise provided, the permittee shall have 30 days after such notification to make the changes.

D. The discharger shall amend the plan whenever there is a change in construction, operation, or maintenance which may affect the discharge of significant quantities of pollutants to the waters of the State or if a facility inspection required by paragraph G of this condition indicates that an amendment is needed. The plan should also be amended if the discharger is in violation of any conditions of this permit, or has not achieved the general objective of controlling pollutants in storm water discharges. Amendments to the plan shall be made within the shortest reasonable period of time, and shall be provided to the Agency for review upon request.

E. The plan shall provide a description of potential sources which may be expected to add significant quantities of pollutants to storm water discharges, or which may result in non-storm water discharges from storm water outfalls at the facility. The plan shall include, at a minimum, the following items:

1. A topographic map extending one-quarter mile beyond the property boundaries of the facility, showing the facility, surface water bodies, wells (including injection wells), seepage pits, infiltration ponds, and the discharge points where the facility's storm water discharges to a municipal storm drain system or other water body The requirements of this paragraph may be included on the site map if appropriate.

2. A site map showing:

   i. The storm water conveyance and discharge structures;

   ii. An outline of the storm water drainage areas for each storm water discharge point;

   iii. Paved areas and buildings;

   iv Areas used for outdoor manufacturing, storage, or disposal of significant materials, including activities that generate significant quantities of dust or particulates.

   v. Location of existing storm water structural control measures (dikes, coverings, detention facilities, etc.),

   vi. Surface water locations and/or municipal storm drain locations

   vii. Areas of existing and potential soil erosion;

viii. Vehicle service areas;

ix. Material loading, unloading, and access areas

3. A narrative description of the following:

i. The nature of the industrial activities conducted at the site, including a description of significant materials that are treated, stored or disposed of in a manner to allow exposure to storm water,

ii. Materials, equipment, and vehicle management practices employed to minimize contact of significant materials with storm water discharges;

iii. Existing structural and non-structural control measures to reduce pollutants in storm water discharges;

iv. Industrial storm water discharge treatment facilities;

v. Methods of onsite storage and disposal of significant materials;

4. A list of the types of pollutants that have a reasonable potential to be present in storm water discharges in significant quantities.

5. An estimate of the size of the facility in acres or square feet, and the percent of the facility that has impervious areas such as pavement or buildings.

6. A summary of existing sampling data describing pollutants in storm water discharges.

F. The plan shall describe the storm water management controls which will be implemented by the facility The appropriate controls shall reflect identified existing and potential sources of pollutants at the facility. The description of the storm water management controls shall include:

1. Storm Water Pollution Prevention Personnel - Identification by job titles of the individuals who are responsible for developing, implementing, and revising the plan.

2. Preventive Maintenance - Procedures for inspection and maintenance of storm water conveyance system devices such as oil/water separators, catch basins, etc., and inspection and testing of plant equipment and systems that could fail and result in discharges of pollutants to storm water.

3. Good Housekeeping - Good housekeeping requires the maintenance of clean, orderly facility areas that discharge storm water. Material handling areas shall be inspected and cleaned to reduce the potential for pollutants to enter the storm water conveyance system.

4. Spill Prevention and Response - Identification of areas where significant materials can spill into or otherwise enter the storm water conveyance systems and their accompanying drainage points. Specific material handling procedures, storage requirements, spill clean up equipment and procedures should be identified, as appropriate. Internal notification procedures for spills of significant materials should be established.

5. Storm Water Management Practices - Storm water management practices are practices other than those which control the source of pollutants. They include measures such as installing oil and grit separators, diverting storm water into retention basins, etc. Based on assessment of the potential of various sources to contribute pollutants, measures to remove pollutants from storm water discharge shall be implemented. In developing the plan, the following management practices shall be considered:

i. Containment - Storage within berms or other secondary containment devices to prevent leaks and spills from entering storm water runoff;

ii Oil & Grease Separation - Oil/water separators, booms, skimmers or other methods to minimize oil contaminated storm water

discharges;

iii. Debris & Sediment Control - Screens, booms, sediment ponds or other methods to reduce debris and sediment in storm water discharges;

iv. Waste Chemical Disposal - Waste chemicals such as antifreeze, degreasers and used oils shall be recycled or disposed of in an approved manner and in a way which prevents them from entering storm water discharges.

v. Storm Water Diversion - Storm water diversion away from materials manufacturing, storage and other areas of potential storm water contamination;

vi. Covered Storage or Manufacturing Areas - Covered fueling operations, materials manufacturing and storage areas to prevent contact with storm water.

6. Sediment and Erosion Prevention - The plan shall identify areas which due to topography, activities, or other factors, have a high potential for significant soil erosion and describe measures to limit erosion.

7. Employee Training - Employee training programs shall inform personnel at all levels of responsibility of the components and goals of the storm water pollution control plan. Training should address topics such as spill response, good housekeeping and material management practices. The plan shall identify periodic dates for such training.

8 Inspection Procedures - Qualified plant personnel shall be identified to inspect designated equipment and plant areas. A tracking or follow-up procedure shall be used to ensure appropriate response has been taken in response to an inspection. Inspections and maintenance activities shall be documented and recorded.

G The permittee shall conduct an annual facility inspection to verify that all elements of the plan, including the site map, potential pollutant sources, and structural and non-structural controls to reduce pollutants in industrial storm water discharges are accurate Observations that require a response and the appropriate response to the observation shall be retained as part of the plan. Records documenting significant observations made during the site inspection shall be submitted to the Agency in accordance with the reporting requirements of this permit.

H This plan should briefly describe the appropriate elements of other program requirements, including Spill Prevention Control and Countermeasures (SPCC) plans required under Section 311 of the CWA and the regulations promulgated thereunder, and Best Management Programs under 40 CFR 125.100.

I. The plan is considered a report that shall be available to the public under Section 308(b) of the CWA. The permittee may claim portions of the plan as confidential business information, including any portion describing facility security measures

J The plan shall include the signature and title of the person responsible for preparation of the plan and include the date of initial preparation and each amendment thereto

REPORTING

K. The facility shall submit an annual inspection report to the Illinois Environmental Protection Agency. The report shall include results of the annual facility inspection which is required by Part G of the Storm Water Pollution Prevention Plan of this permit. The report shall also include documentation of any event (spill, treatment unit malfunction, etc.) which would require an inspection, results of the inspection, and any subsequent corrective maintenance activity. The report shall be completed and signed by the authorized facility employee(s) who conducted the inspection(s).

L. The first report shall contain information gathered during the one year time period beginning with the effective date of coverage under this permit and shall be submitted no later than 60 days after this one year period has expired. Each subsequent report shall contain the previous year's information and shall be submitted no later than one year after the previous year's report was due.

M. Annual inspection reports shall be mailed to the following address:

NPDES Permit No. IL0002381

Special Conditions

Illinois Environmental Protection Agency
Bureau of Water
Compliance Assurance Section
Annual Inspection Report
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

N. If the facility performs inspections more frequently than required by this permit, the results shall be included as additional information in the annual report.

SPECIAL CONDITION 4: The discharge at Outfall 001 is subject to the following limitations and monitoring requirements:

Until the expiration date of this permit:

	Load Limits lbs/day		Concentration Limits mg/l			
	30 day Avg.	Daily Max.	30 Day Avg.	Daily Max.	Sample Frequency	Sample Type
BOD_5	150	450			1/week	composite
Total Suspended Solids	2000				1/week	composite
Oil and Grease			15	30	1/week	Grab

At the time of application for renewal of this permit (180 days prior to expiration), A. E. Staley shall submit the results of it's Water Quality Impact Study. The submittal shall include the results of all stormwater sampling, an outline of the Best Management Practices that have been implemented, and an evaluation of how these BMP's have improved or affected the quality of stormwater discharges at the facility.

Final limitations will be imposed, based on the results of this study, upon the reissuance of this permit (in three years).

SPECIAL CONDITION 5: Samples taken in compliance with the effluent monitoring requirements shall be taken at a point representative of the discharge, but prior to entry into the receiving stream.

SPECIAL CONDITION 6: The permittee shall continue it's water quality impact study for a period of two years from the issuance of this permit.

Staley shall monitor the stormwater discharge from outfall 001 for pH, oil and grease, BOD_5 and TSS. Sampling for pH and oil and grease shall be grab samples taken during the first 30 minutes (or as soon thereafter as practicable) of a discharge. For BOD_5 and TSS both a grab sample taken during the first 30 minutes (or as soon thereafter as practicable) of a discharge, and a flow weighted composite must be analyzed. A minimum of one grab sample shall be taken from any holding ponds or other impoundments with a retention period of greater than 24 hours. All samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inches and at least 72 hours from the previously measurable storm event. Flow weighted composites samples shall be taken for the entire event or the first three hours of the event, whichever is shorter. Visual inspections of the receiving stream shall also be conducted during the sampling time periods, or as soon as practicable to ensure that Lake Decatur water quality is protected. If no qualifying storm occurs during each one week sampling period, and a discharge of groundwater occurs, a sample shall be taken of the discharge for compliance purposes.

addition to the monitoring program the study should include the following items:

NPDES Permit No. IL0002381

Special Conditions

(a) Evaluation of means to reduce the potential for stormwater becoming contaminated with raw materials, intermediate products, final products, waste materials or by-products.

(b) Review the use of the Best Management Practices (BMP) (which includes the Storm Water Pollution Prevention Plan) such as housekeeping measures to reduce the potential for stormwater contamination from process products.

(c) If it is determined that the receiving stream or Lake Decatur would be impacted by the facility's stormwater discharge then the plan should include evaluation of solutions which would bring the discharge into compliance with state water quality standards.

SPECIAL CONDITION 7: For the purpose of this permit, the discharge is limited to stormwater and groundwater seepage, free from process and other wastewater discharges.

SPECIAL CONDITION 8. The permittee shall record monitoring results on Discharge Monitoring Report forms using one such form for each discharge each month. The completed Discharge Monitoring Report form shall be submitted monthly to IEPA, no later than the 15th of the following month, unless otherwise specified by the Agency, to the following address:

Illinois Environmental Protection Agency
Bureau of Water
Compliance Assurance Section
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

SPECIAL CONDITION 9. If an applicable effluent standard or limitation is promulgated under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a)(2) of the Clean Water Act and that effluent standard or limitation is more stringent than any effluent limitation in the permit or controls a pollutant not limited in the NPDES Permit, the Agency shall revise or modify the permit in accordance with the more stringent standard or prohibition and shall so notify the permittee.

ATTACHMENT H

Standard Conditions

Definitions

Act means the Illinois Environmental Protection Act, Ch 111 1/2 Ill Rev Stat Sec 1001 1097 as Amended

Agency means the Illinois Environmental Protection Agency

Board means the Illinois Pollution Control Board

Clean Water Act (formerly referred to as the Federal Water Pollution Control Act) means Pub L 92 500 as amended 33 U S C 1251 et seq

NPDES (National Pollutant Discharge Elimination System) means the national program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits and imposing and enforcing pretreatment requirements under Sections 307 402 318 and 405 of the Clean Water Act

USEPA means the United States Environmental Protection Agency

Daily Discharge means the discharge of a pollutant measured during a calendar day or any 24 hour period that reasonably represents the calendar day for purposes of sampling For pollutants with limitations expressed in units of mass, the daily discharge is calculated as the total mass of the pollutant discharged over the day For pollutants with limitations expressed in other units of measurements the daily discharge is calculated as the average measurement of the pollutant over the day

Maximum Daily Discharge Limitation (daily maximum) means the highest allowable daily discharge

Average Monthly Discharge Limitation (30 day average) means the highest allowable average of daily discharges over a calendar month calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

Average Weekly Discharge Limitation (7 day average) means the highest allowable average of daily discharges over a calendar week calculated as the sum of all daily discharges measured during a calendar week divided by the number of daily discharges measured during that week

Best Management Practices (BMPs) means schedules of activities, prohibitions of practices, maintenance procedures and other management practices to prevent or reduce the pollution of waters of the State BMPs also include treatment requirements operating procedures, and practices to control plant site runoff spillage or leaks sludge or waste disposal, or drainage from raw material storage

Aliquot means a sample of specified volume used to make up a total composite sample

Grab Sample means an individual sample of at least 100 milliliters collected at a randomly selected time over a period not exceeding 15 minutes

24 Hour Composite Sample means a combination of at least 8 sample aliquots of at least 100 milliliters, collected at periodic intervals during the operating hours of a facility over a 24-hour period

8 Hour Composite Sample means a combination of at least 3 sample aliquots of at least 100 milliliters collected at periodic intervals during the operating hours of a facility over an 8 hour period

Flow Proportional Composite Sample means a combination of sample aliquots of at least 100 milliliters collected at periodic intervals such that either the time interval between each aliquot or the volume of each aliquot is proportional to either the stream flow at the time of sampling or the total stream flow since the collection of the previous aliquot

(1) Duty to comply The permittee must comply with all conditions of this permit Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action permit termination revocation and reissuance modification or for denial of a permit renewal application The permittee shall comply with effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions even if the permit has not yet been modified to incorporate the requirement

(2) Duty to reapply If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit the permittee must apply for and obtain a new permit If the permittee submits a proper application as required by the Agency no later than 180 days prior to the expiration date this permit shall continue in full force and effect until the final Agency decision on the application has been made

(3) Need to halt or reduce activity not a defense It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit

(4) Duty to mitigate The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment

(5) Proper operation and maintenance The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit Proper operation and maintenance includes effective performance adequate funding adequate operator staffing and training and adequate laboratory and process controls including appropriate quality assurance procedures This provision requires the operation of back up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit

(6) Permit actions This permit may be modified, revoked and reissued, or terminated for cause by the Agency pursuant to 40 CFR 122 62 The filing of a request by the permittee for a permit modification revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition

(7) Property rights This permit does not convey any property rights of any sort, or any exclusive privilege

(8) Duty to provide information The permittee shall furnish to the Agency within a reasonable time, any information which the Agency may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. The permittee shall also furnish to the Agency, upon request, copies of records required to be kept by this permit

(9) Inspection and entry The permittee shall allow an authorized representative of the Agency upon the presentation of credentials and other documents as may be required by law to

(a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted or where records must be kept under the conditions of this permit

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit,

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit and

(d) Sample or monitor at reasonable times, for the purpose of assuring permit compliance, or as otherwise authorized by the Act, any substances or parameters at any location

(10) Monitoring and records

(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity

(b) The permittee shall retain records of all monitoring information, including all calibration and maintenance records, and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of this permit, measurement, report or application. This period may be extended by request of the Agency at any time.

(c) Records of monitoring information shall include

(1) The date exact place, and time of sampling or measurements,

(2) The individual(s) who performed the sampling or measurements

(3) The date(s) analyses were performed,

(4) The individual(s) who performed the analyses,

(5) The analytical techniques or methods used, and

(6) The results of such analyses.

(d) Monitoring must be conducted according to test procedures approved under 40 CFR Part 136 unless other test procedures have been specified in this permit Where no test procedure under 40 CFR Part 136 has been approved the permittee must submit to the Agency a test method for approval The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to ensure accuracy of measurements

(11) Signatory requirement All applications reports or information submitted to the Agency shall be signed and certified

(a) Application All permit applications shall be signed as follows

(1) For a corporation by a principal executive officer of at least the level of vice president or a person or position having overall responsibility for environmental matters for the corporation

(2) For a partnership or sole proprietorship by a general partner or the proprietor respectively or

(3) For a municipality, State, Federal, or other public agency by either a principal executive officer or ranking elected official.

(b) Reports All reports required by permits, or other information requested by the Agency shall be signed by a person described in paragraph (a) or by a duly authorized representative of that person. A person is a duly authorized representative only if

(1) The authorization is made in writing by a person described in paragraph (a) and

(2) The authorization specifies either an individual or a position responsible for the overall operation of the facility from which the discharge originates, such as a plant manager, superintendent or person of equivalent responsibility, and

(3) The written authorization is submitted to the Agency

PRINTED ON RECYCLED PAPER

(c) Changes of Authorization If an authorization under (b) is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of (b) must be submitted to the Agency prior to or together with any reports, information, or applications to be signed by an authorized representative.

(12) Reporting requirements

(a) Planned changes The permittee shall give notice to the Agency as soon as possible of any planned physical alterations or additions to the permitted facility

(b) Anticipated noncompliance The permittee shall give advance notice to the Agency of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements

(c) Compliance schedules Reports of compliance or noncompliance with or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date

(d) Monitoring reports Monitoring results shall be reported at the intervals specified elsewhere in this permit

(1) Monitoring results must be reported on a Discharge Monitoring Report (DMR)

(2) If the permittee monitors any pollutant more frequently than required by the permit using test procedures approved under 40 CFR 136 or as specified in the permit the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR

(3) Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Agency in the permit

(e) Twenty-four hour reporting The permittee shall report any noncompliance which may endanger health or the environment Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances The written submission shall contain a description of the noncompliance and its cause, the period of noncompliance including exact dates and times, and if the noncompliance has not been corrected the anticipated time it is expected to continue and steps taken or planned to reduce, eliminate and prevent reoccurrence of the noncompliance The following shall be included as information which must be reported within 24 hours

(1) Any unanticipated bypass which exceeds any effluent limitation in the permit

(2) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Agency in the permit to be reported within 24 hours,

The Agency may waive the written report on a case-by case basis if the oral report has been received within 24 hours

(f) Other noncompliance The permittee shall report all instances of noncompliance not reported under paragraphs (12)(c) (d) or (e) at the time monitoring reports are submitted The reports shall contain the information listed in paragraph (12)(e)

(g) Other information. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in a permit application, or in any report to the Agency it shall promptly submit such facts or information

(13) Transfer of permits A permit may be automatically transferred to a new permittee if

(a) The current permittee notifies the Agency at least 30 days in advance of the proposed transfer date

(b) The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittees and

(c) The Agency does not notify the existing permittee and the proposed new permittee of its intent to modify or revoke and reissue the permit If this notice is not received the transfer is effective on the date specified in the agreement.

(14) All manufacturing, commercial, mining, and silvicultural dischargers must notify the Agency as soon as they know or have reason to believe

(a) That any activity has occurred or will occur which would result in the discharge of any toxic pollutant identified under Section 307 of the Clean Water Act which is not limited in the permit, if that discharge will exceed the highest of the following notification levels

(1) One hundred micrograms per liter (100 ug/l),

(2) Two hundred micrograms per liter (200 ug/l) for acrolein and acrylonitrile five hundred micrograms per liter (500 ug/l) for 2,4 dinitrophenol and for 2-methyl-4,6 dinitrophenol and one milligram per liter (1 mg/l) for antimony,

(3) Five (5) times the maximum concentration value reported for that pollutant in the NPDES permit application or

(4) The level established by the Agency in this permit

(b) That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the NPDES permit application

(15) All Publicly Owned Treatment Works (POTWs) must provide adequate notice to the Agency of the following

(a) Any new introduction of pollutants into that POTW from an indirect discharge which would be subject to Sections 301 or 306 of the Clean Water Act if it were directly discharging those pollutants and

(b) Any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit

(c) For purposes of this paragraph adequate notice shall include information on (i) the quality and quantity of effluent introduced into the POTW and (ii) any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW

(16) If the permit is issued to a publicly owned or publicly regulated treatment works the permittee shall require any industrial user of such treatment works to comply with federal requirements concerning

(1) User charges pursuant to Section 204(b) of the Clean Water Act and applicable regulations appearing in 40 CFR 35

(2) Toxic pollutant effluent standards and pretreatment standards pursuant to Section 307 of the Clean Water Act and

(3) Inspection monitoring and entry pursuant to Section 308 of the Clean Water Act

(17) If an applicable standard or limitation is promulgated under Section 301(b)(2)(C) and (D) 304(b)(2) or 307(a)(2) and that effluent standard or limitation is more stringent than any effluent limitation in the permit, or controls a pollutant not limited in the permit the permit shall be promptly modified or revoked and reissued to conform to that effluent standard or limitation

(18) Any authorization to construct issued to the permittee pursuant to 35 Ill Adm Code 309 154 is hereby incorporated by reference as a condition of this permit

(19) The permittee shall not make any false statement, representation or certification in any application record report, plan or other document submitted to the Agency or the USEPA or required to be maintained under this permit

(20) The Clean Water Act provides that any person who violates a permit condition implementing Sections 101 302, 306 307 308 318 or 405 of the Clean Water Act is subject to a civil penalty not to exceed $10 000 per day of such violation Any person who willfully or negligently violates permit conditions implementing Sections 301 302 306 307 or 308 of the Clean Water Act is subject to a fine of not less than $2 500 nor more than $25 000 per day of violation or by imprisonment for not more than one year or both

(21) The Clean Water Act provides that any person who falsifies tampers with or knowingly renders inaccurate any monitoring device or method required to be maintained under permit shall upon conviction be punished by a fine of not more than $10 000 per violation or by imprisonment for not more than 6 months per violation, or by both

(22) The Clean Water Act provides that any person who knowingly makes any false statement representation or certification in any record or other document submitted or required to be maintained under this permit shall including monitoring reports or reports of compliance or non-compliance shall upon conviction be punished by a fine of not more than $10 000 per violation or by imprisonment for not more than 6 months per violation or by both

(23) Collected screenings, slurries sludges, and other solids shall be disposed of in such a manner as to prevent entry of those wastes (or runoff from the wastes) into waters of the State The proper authorization for such disposal shall be obtained from the Agency and is incorporated as part hereof by reference

(24) In case of conflict between these standard conditions and any other condition(s) included in this permit (the other condition(s) shall govern

(25) The permittee shall comply with, in addition to the requirements of the permit all applicable provisions of 35 Ill Adm Code, Subtitle C, Subtitle D Subtitle E and all applicable orders of the Board

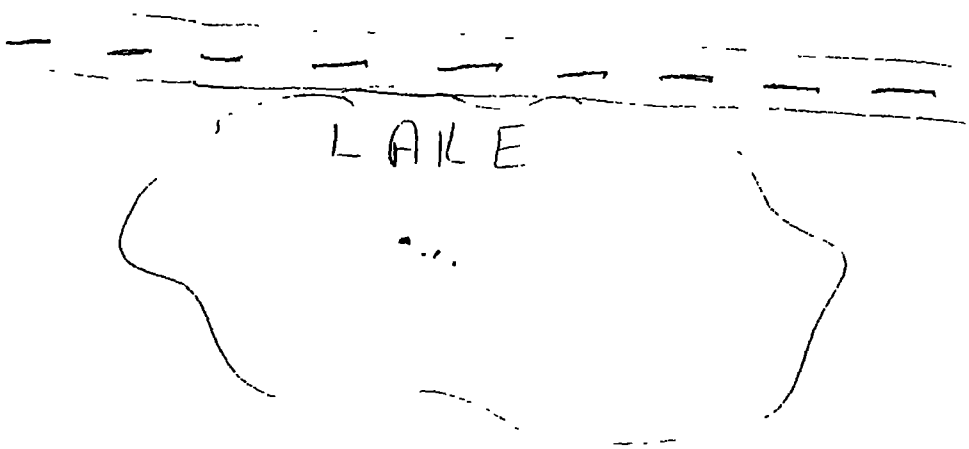
(26) The provisions of the permit are severable, and if any provision of the permit or the application of any provision of the permit is held invalid, the remaining provisions of this permit shall continue in full force and effect

Document No. 4

HOT | WATER | DITCH

concrete

rock #1	paper #2	big rocks #3	#4	#5	#6	#7 rock	#8 rock	#9 between the
—	—	—	—	7:30AM 7.2	—	—	—	—
10AM 2.5	2.5	2.5	6.0	7.0	7.3	3.5	3.3	3.5
11AM 4.2	3.6	4.0	6.4	6.6	6.2	5.6	3.5	4.9
12 noon 2.4	2.7	2.8	6.5	6.6	6.6	2.7	2.7	2.6
2pm 5.0	5.2	4.9	5.5	6.4	6.5	5.6	4.8	4.9
3pm 5.3	5.1	3.0	5.0	5.8	5.9	5.9	5.0	5.0
4pm 5.8	5.9	5.3	5.2	5.9	5.3	5.5	5.0	5.0
5pm 5.9	6.2	6.0	6.2	5.9	6.1	6.2	6.1	5.4



Moser Lane

9AM sampler ph=5.5 weir ph=5.0 reading at outfall = 4.8

Hot Water Ditch

6-21-98
Nights
D. Hunt

Time	#1	#2	#3	#4	#5	#6	#7	#8	#9	Moser lane
:00pm	6.09	6.06	5.89	5.98	6.00	6.13	6.06	6.00	5.26	
1:00 pm										10.4
:00 pm	5.89	5.85	5.65	5.63	5.83	5.66	5.60	5.64	5.59	
:00 pm	5.95	5.90	5.84	5.83	5.89	6.64	6.07	5.96	5.91	
9:00 pm	5.98	5.96	5.88	5.87	6.01	6.36	5.98	5.91	5.92	7.8 @ ML
1.00 pm	6.09	5.96	5.96	5.91	5.91	6.01	5.96	6.08	6.09	7.81
3 Night	6.17	6.06	6.09	5.99	5.91	5.94	6.08	6.12	6.13	7.52
00 AM	6.37	6.22	6.09	6.00	5.98	6.38	6.22	6.23	6.29	7.48
00 AM	6.38	6.24	6.10	6.03	5.99	6.35	6.22	6.25	6.26	7.37
:00 AM	6.58	6.46	6.06	6.15	6.23	6.27	6.59	6.58	6.50	7.37
:00 AM										
00 AM	6.59	6.62	6.44	6.19	6.52	6.91	6.65	6.52	6.45	7.27

Hot WATER DITCH

6/22/98

C. Carter

MOSS LANE

	#2	#3	#4	#5	#6	#7	#8	#9	#10
6.94	6.79	7.14	6.83	7.75	7.00	6.84	6.77	6.74	7.30
6.79	6.92	6.86	7.14	7.44	7.13	6.97	6.87	6.93	7.12
7.21	6.95	7.08	7.01	7.19	6.97	6.94	7.00	7.00	7.24
7.00	7.06	7.00	7.14	7.28	7.39	7.36	7.29	7.17	7.27
7.00	7.09	7.13	7.14	7.22	7.11	7.02	7.05	7.08	7.3
7.21	7.04	7.02	7.22	7.66	7.20	7.06	7.11	7.15	7.45

original b

Document No. 5

A.E. STALEY MANUFACTURING COMPANY 2200 E. ELDORADO STREET DECATUR, ILLINOIS 62525 TELEPHONE 217/423-4411

June 22, 1998

CERTIFIED MAIL Receipt #Z 733 403 233

Illinois Emergency Management Agency
110 E. Adams Street
Springfield, Illinois 62706
Mr. Dean Schlee

Reference: IESDA Incident #981489

Dear Mr. Schlee,

The A.E. Staley Manufacturing Company is providing this follow-up report, as required by Section 304 of SARA Title III, to the verbal notification concerning a release of sulfuric acid on June 20, 1997. Information in this notice has been organized to address specific items referenced in the regulations.

- **The chemical name or identity of any substance involved in the release:** Sulfuric Acid (93% by weight), CAS# 7664-93-9.

- **Any indication of whether the substance is an extremely hazardous substance:** Sulfuric acid is an extremely hazardous substance, subject to the reporting requirements of Section 304 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 355.

- **An estimate of the quantity of any such substance that was released into the environment:** Approximately 72,000 pounds of liquid sulfuric acid leaked from a 2" hose used in transferring the acid from tank trucks to the starch process. A failure of the hose was the source of the leak. Of the 72,000 pounds originally spilled, remediation efforts were able to neutralize an estimated 35.2% of the spill amount prior to any potential Lake entry The final estimated loss then becomes 47,646 pounds.

- **The time and duration of the release:** The release was discovered at 9:50 p.m. on June 20, 1998 The valve on the tank truck controlling the flow was closed at 9:51 p.m., stopping the release. Since the initial failure of the hose was not immediately detected, the duration of the leak cannot be determined with any accuracy.

- **The medium or media into which the release occurred:** Liquid sulfuric acid spilled onto the asphalt and flowed approximately 5' to Catch Basin 278. This catch basin is part of a stormwater sewer system that ultimately discharges to a tributary leading to Lake Decatur.

- **Any known or anticipated acute or chronic health risks associated with the emergency and, where appropriate, advice regarding medical attention necessary for exposed individuals:** Although sulfuric acid is considered a toxic chemical and poses a severe acute risk with skin contact or respiratory problems in vaporous form, there were no exposure issues throughout the event. Discharge of the sulfuric acid was into a stormwater sewer which was ultimately diluted and neutralized with soda ash and surface water. The point at which the spill entered Lake Decatur is more than two miles from the inlet to the Decatur Water Treatment Plant. Therefore, the release would be fully diluted and pose no threat to the drinking water supply. It is the same logic then, that would eliminate any risk to individuals engaging in water activities in Lake Decatur. In fact, tests by IEPA showed normal ph levels in the lake.

- **Proper precautions to take as a result of the release, including evacuation (unless such information is readily available to the community emergency coordinator pursuant to the emergency plan):** As stated previously, there was no threat to the immediate area where the spill occurred. All containment, neutralization and clean-up efforts were facilitated in compliance with the Company's emergency response plan.

  The following authorities were notified in compliance with the regulatory requirements:

  1. **National Response Center,** 6/20/98 at 10:40 p.m., contacted Ms. Kinney of the NRC, who stated computers were down and information would be entered manually. Ms. Kinney explained that we would be contacted later with a Report Number. This call took approximately 20 minutes. On 6/22/98 at 6:40 a.m., Ms. Reddy of the NRC contacted Staley with a Report No. 442489.

  2. **Illinois Emergency Management Agency,** was contacted immediately following the call to the NRC at approximately 11:00 p.m. on 6/20/98. Jessica of the IEMA took the call and issued Incident No. 981489.

  3. **Macon County ESDA.** A call was attempted immediately following the call to IEMA with no answer. When contact could not be made the Macon County Sheriff's was called at 11:24 p.m., 6/20/98.

- **The names and telephone number of the person or persons to be contacted for further information:**

  Jane B. Barnett
  Manager, Environmental & Safety
  A.E. Staley Manufacturing Company
  (217) 421-3176

- **Actions taken to respond to and contain the release:** Initial action taken to stop the leak was closure of a valve on the tank truck containing sulfuric acid. Next, there was an effort to contain by diking at the nearest point practicable downstream from spill entry. In addition, efforts began to neutralize the H2S04, using both liquid and dry soda ash based on the applicability. Simultaneous to the neutralization effort, vacuum trucks were dispatched in attempt to "draw out" contaminated water and haul to the Plant's #2 clarifier where it is neutralized and released to the SDD through the sanitary sewer. These steps were in agreement with the recommendations of Ralph Foster, IEPA, who contacted the Plant at 11:09 p.m. on 6/20/98. Mr. Foster's call was in response to the IEMA reporting. When told that the contaminant was going to a body of water, he suggested diking, drawing out and flushing. The responding Staley representative assured him those efforts were underway.

- **Any known or anticipated acute or chronic health risks associated with the release:** When the leak was found, there were no exposure issues. Once efforts to contain, control, neutralize and clean-up began, all necessary personal protective measures were taken.

- **Where appropriate, advice regarding medical attention necessary for exposed individuals:** No advice regarding medical attention is warranted for this release.

Sincerely,

Jane Barnett

Jane Barnett
Manager, Environmental and Safety

cc: Macon County Emergency Services and Disaster Agency
282 East Macon Street
Decatur, Illinois 62523
Attn: Phillip Anello

Document No. 6

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 *Mary A. Gade, Director*

217/782-9720

CERTIFIED MAIL # P 344 333 987
RETURN RECEIPT REQUESTED

August 6, 1998

Rec'd 8/10/98
L.W. Elder

A.E. STALEY
2200 ELDORADO STREET
DECATUR, IL 62525

Re: Violation Notice: M-1998-00091
Facility I.D.: IL0002381

Dear Facility Owner:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(1), and is based upon review of available information and investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of violations of environmental statutes, regulations or permits as set forth in Attachment A to this letter. Attachment A includes an explanation of the activities that the Illinois EPA believes may resolve the specified violations, including an estimate of a reasonable time period to complete the necessary activities. However, due to the nature and seriousness of the violations cited, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. The response must address each violation specified in Attachment A and include for each, an explanation of the activities that will be implemented and the time schedule for the completion of each activity. Also, if a pollution prevention activity will be implemented, indicate that intention in any written response. The written response will constitute a proposed Compliance Commitment Agreement ("CCA") pursuant to Section 31 of the Act. The Illinois EPA will review the proposed CCA and will accept or reject the proposal within 30 days of receipt.

Printed on Recycled Paper

The Illinois EPA encourages the use of pollution prevention methods to help achieve compliance with environmental requirements. By switching to non-hazardous raw materials, improving housekeeping practices, or changing production processes to generate less pollution, it may be possible to save money, increase efficiency, and reduce environmental regulatory requirements.

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with a referral to the prosecutorial authority.

Written communications should be directed to BEVERLY BOOKER at the ILLINOIS EPA, BUREAU OF WATER, CAS #19, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276. All communications must include reference to this Violation Notice number, M-1998-00091.

Questions regarding this matter should be directed to MARK T. BOOKS at 217/782-9720.

Sincerely,

Kenneth R. Rogers, Manager
Compliance Assurance Section
Bureau of Water

Attachment

ATTACHMENT A

IL0002381

A. E. STALEY, DECATUR **VIOLATION NOTICE: M-1998-00091**

Questions regarding the violations identified in this attachment should be directed to MARK T. BOOKS at (217)782-9720.

Information available to the Illinois EPA indicates that A. E. Staley, Decatur, spilled sulfuric acid into a tributary to Lake Decatur. This discharge of sulfuric acid resulted in a fish kill.

A review of information available to the Illinois EPA indicates the following violations of statutes, regulations or permits. Included with each type of violation is an explanation of the activities the Illinois EPA believes may resolve the violations including an estimated time period for resolution.

Fish Kill

An investigation of a fish kill on a tributary to Lake Decatur was conducted on June 22, 1998 by personnel from the Illinois EPA and the Illinois Department of Natural Resources ("IDNR"). The results of the investigation indicate that sulfuric acid was the cause of the fish kill.

Enclosed for your information is a copy of the fish count/fish value assessment report completed by IDNR. As indicated in the report 2,488 fish were killed, and these were valued at $1,312.48. The investigation expenses incurred by IDNR were $712.72. The total of these amounts is $2,025.20.

Violation Date	**Violation Description**
06/20/98	FISH KILL
Rule/Reg.:	Section 42(c) of the Act, 415ILCS 5/12(c) (1996)

The above Act states as follows:

> Any person that violates this Act, or an order or other determination of the Board under this Act, and causes the death of fish or aquatic life shall, in addition to other penalties provided by this Act, be liable to pay to the State an additional sum for the reasonable value of the fish or aquatic life destroyed. Any money so recovered shall be placed in the Wildlife and Fish Fund in the State Treasury.

Illinois EPA has determined that the fish kill occurred as a result of the sulfuric acid released from your facility on June 20, 1998. Your are consequently liable for payment of the fish kill value and investigation expenses in the amount of $2,025.20 which should be made payable to the **STATE OF ILLINOIS WILDLIFE AND FISH FUND.**

Please submit the check to the attention of BEVERLY BOOKER at the address shown on page two of this letter. Upon receipt of the check, you will be provided a copy of the letter of transmittal by which the check will be transmitted to the IDNR. Please be aware that in addition to obtaining reimbursement for the value of the fish killed, the Illinois EPA reserves the right to pursue other remedies as authorized by the Illinois Environmental Protection Act, including injunctive relief, civil penalties or other legal action as necessary.

ATTACHMENT A

IL0002381

Water Quality Violations

Review the plant operations procedures in order to correct the deficiencies which caused the violations. Compliance is expected to be achieved immediately.

Violation Date	Violation Description
06/20 & 21/98	WATER QUALITY pH VIOLATIONS
Rule/Reg.:	Section 12(a) of the Act, 415 ILCS 5/12(a) (1996), 35 Ill. Adm. Code 302.204

Effluent Violations

Review plant operations procedure in order to correct the deficiencies which caused the violations. Compliance is expected to be achieved within 30 days.

Violation Date	Violation Description
01/31/98	0010 EFFLUENT - BOD, 5-DAY (20 DEG. C) EFFLUENT LIMIT
Rule/Reg.:	Section 12(a) and (f) of the Act, 415 ILCS 5/12(a) and (f) (1996), 35 Ill. Adm. Code 304.141(a), NPDES Permit
02/28/98	0010 EFFLUENT - BOD, 5-DAY (20 DEG. C) EFFLUENT LIMIT
Rule/Reg.:	Section 12(a) and (f) of the Act, 415 ILCS 5/12(a) and (f) (1996), 35 Ill. Adm. Code 304.141(a), NPDES Permit
03/31/98	0010 EFFLUENT - BOD, 5-DAY (20 DEG. C) EFFLUENT LIMIT
Rule/Reg.:	Section 12(a) and (f) of the Act, 415 ILCS 5/12(a) and (f) (1996), 35 Ill. Adm. Code 304.141(a), NPDES Permit
05/31/98	0010 EFFLUENT - BOD, 5-DAY (20 DEG. C) EFFLUENT LIMIT
Rule/Reg.:	Section 12(a) and (f) of the Act, 415 ILCS 5/12(a) and (f) (1996), 35 Ill. Adm. Code 304.141(a), NPDES Permit
06/30/98	0010 EFFLUENT - BOD, 5-DAY (20 DEG. C) EFFLUENT LIMIT
Rule/Reg.:	Section 12(a) and (f) of the Act, 415 ILCS 5/12(a) and (f) (1996), 35 Ill. Adm. Code 304.141(a), NPDES Permit
06/30/98	0010 EFFLUENT - pH EFFLUENT LIMIT
Rule/Reg:	Section 12(a) and (f) of the Act, 415 ILCS 5/12(a) and (f) (1996), 35 Ill. Adm. Code 304.125(a), 304.141(a), NPDES Permit

Document No. 7
I.1

Control by USGS and USC&GS

Topography by photogrammetric methods from aerial photographs taken 1965. Field checked 1967

Soundings compiled from chart furnished by Illinois Department of Conservation

Polyconic projection. 1927 North American datum 10,000-foot grid based on Illinois coordinate system, east zone 1000-metre Universal Transverse Mercator grid ticks, zone 16, shown in blue

Red tint indicates areas in which only landmark buildings are shown

Fine red dashed lines indicate selected fence and field lines where generally visible on aerial photographs. This information is unchecked

Revisions shown in purple compiled from aerial photographs taken 1975. This information not field checked

SCALE 1:24 000

1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETRE

CONTOUR INTERVAL 10 FEET
DOTTED LINES REPRESENT 5-FOOT CONTOURS
NATIONAL GEODETIC VERTICAL DATUM OF 1929

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, RESTON, VIRGINIA 22092
AND BY THE STATE GEOLOGICAL SURVEY, URBANA, ILLINOIS 61801
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

GN MN
1°14' 22 MILS
2° 36 MILS
UTM GRID AND 1975 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

STATE OF ILLINOIS
DEPARTMENT OF REGISTRATION AND EDUCATION
GEOLOGICAL SURVEY DIVISION
URBANA, ILLINOIS

DECATUR QUADRANGLE
ILLINOIS—MACON CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)
SW/4 DECATUR 15' QUADRANGLE

3263 IV NE (ARGENTA)
3263 IV NW (FORSYTH)
MONTICELLO (VIA ILL. 47) 24 MI
0.2 MI. TO JUNC. ILL. 47 & 121
R. 2 E. 55' R. 3 E.
340 000 FEET
88°52'30"
39°52'30"
1 160 000 FEET

ROAD CLASSIFICATION

Heavy-duty
Medium-duty
Light-duty
Unimproved dirt
U.S. Route
State Route

DECATUR, ILL.
SW/4 DECATUR 15' QUADRANGLE
N3945—W8852.5/7.5

1967
PHOTOREVISED 1975
AMS 3263 IV SW—SERIES V863

I-1

All grounds are paved unless noted otherwise through color shading

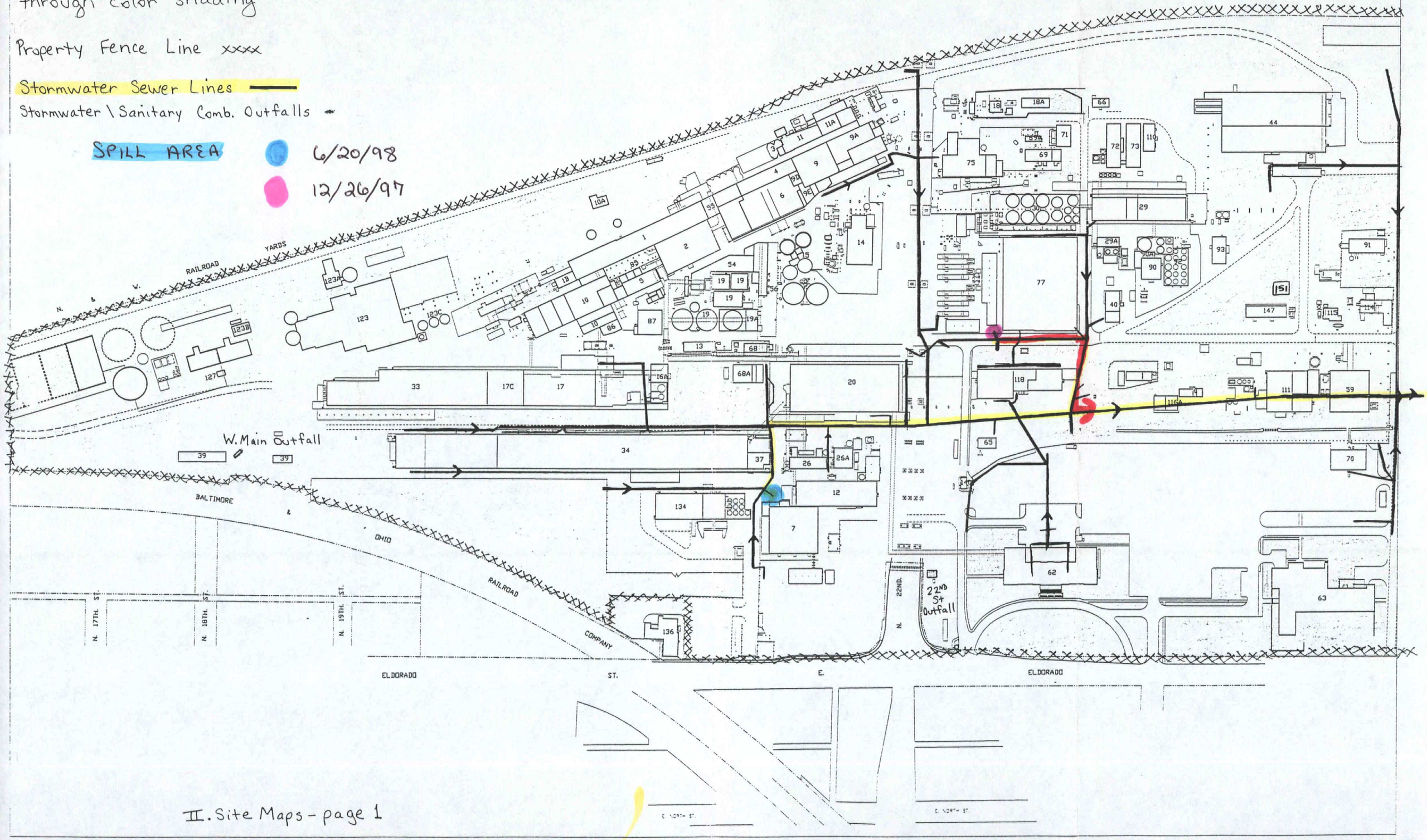
Property Fence Line xxxx

Stormwater Sewer Lines ——

Stormwater \ Sanitary Comb. Outfalls -

SPILL AREA 6/20/98

12/26/97



Unpaved Plant areas
Flow of stormwater sewer system →
Stormwater Sewer Lines —
X Buildings demolished since 9-1-96

Underground Field Tile Flow

ELEVATOR 'D' STORAGE TANKS

ELEVATOR 'C' STORAGE TANKS

Solid IRON DAM

Staley Lake

105 RESERVOIR

lake overflow point

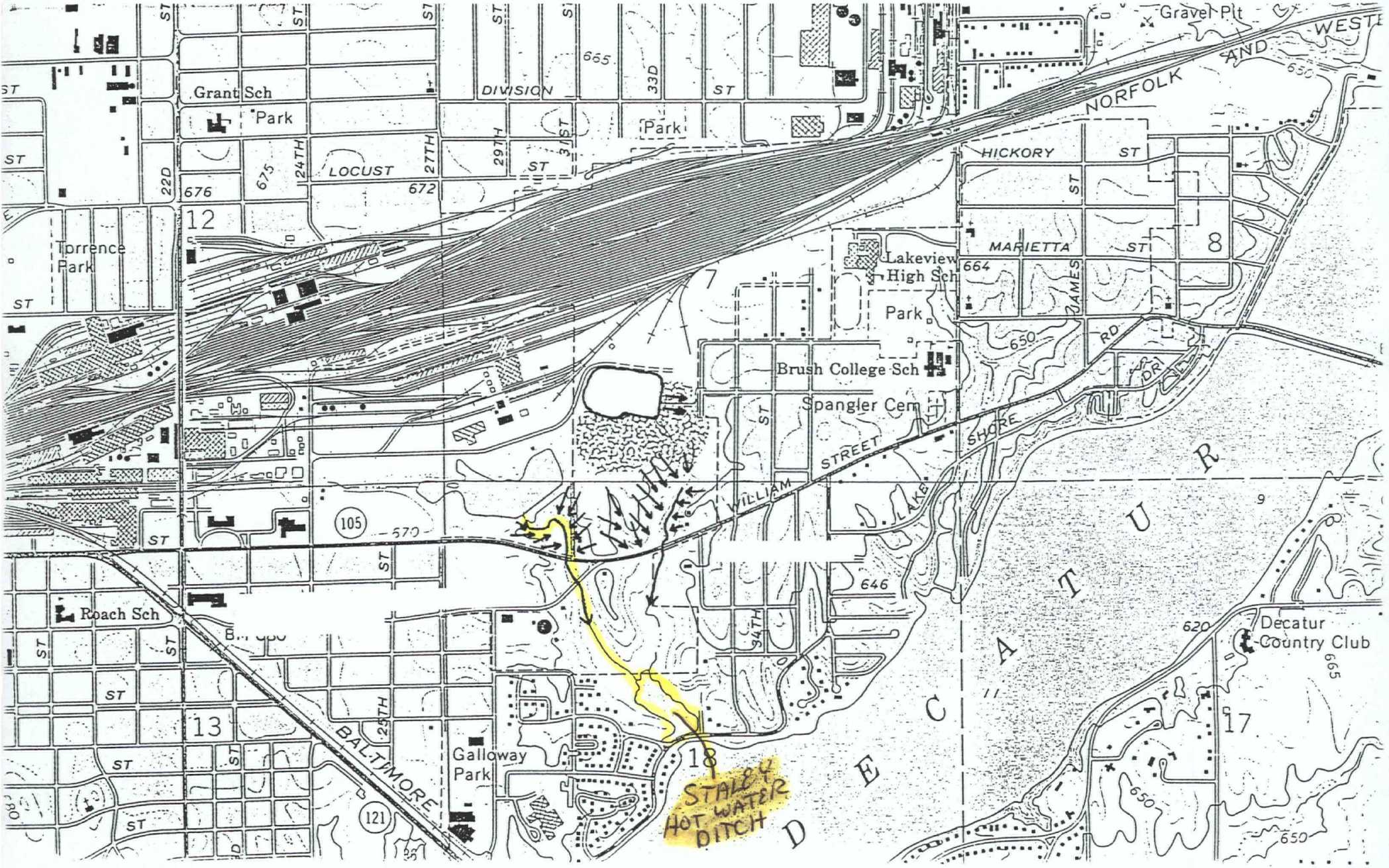
25th St. Outfall

Moser Lane Outfall

3 VAC/Pump TRUCKS DIKED WITH SODA ASH

Unnamed Tributary flows to Lake Decatur

Document No. 10



Document No. 11

08/16/98 22:59 A.E.STALEY BLDG 134 → 217 421 4507 NO.007 D03

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)
NAME A. E. STALEY, DECATUR
ADDRESS 2200 EAST ELDORADO STREET
DECATUR IL 62525

FACILITY A. E. STALEY, DECATUR
LOCATION DECATUR IL 62525

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

(2-16)	(17-19)
IL0002731	001 C
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD							
	YEAR	MO	DAY		YEAR	MO	DAY
FROM	[illegible]	[illegible]	[illegible]	TO	[illegible]	[illegible]	[illegible]
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

STORM WATER RUNOFF AND CS
(STER 04)
F - FINAL
MINCR
EFFLUE May 98
*** NO DISCHARGE | | ***

Form Approved.
OMB No. 2040-0004
Approval expires 05-31-98
12345

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		QUANTITY OR LOADING (3 Card Only) AVERAGE (46-53)	MAXIMUM (54-61)	UNITS	QUANTITY OR CONCENTRATION (4 Card Only) MINIMUM (38-45)	AVERAGE (46-53)	MAXIMUM (54-61)	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
BOD, 5-DAY (20 DEG. C)	SAMPLE MEASUREMENT	299	1881	(26)	******	******	******	(19)	6		
00310 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	150 30DA AVG	450 DAILY MX	LBS/DY	******	******	******	MG/L		WEEKLY	COMPOS
PH	SAMPLE MEASUREMENT	******	******		7.3	******	8.3	(12)	0		
00400 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	*** ****	6.0 MINIMUM	******	9.0 MAXIMUM	SU		WEEKLY	GRAB
SOLIDS, TOTAL SUSPENDED	SAMPLE MEASUREMENT	293	******	(26)	******	******	******	(19)	0		
00530 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	2000 30DA AVG	******	LBS/DY	******	******	******	MG/L		WEEKLY	COMPOS
OIL AND GREASE	SAMPLE MEASUREMENT	******	******	(26)	******	3	8	(19)	0		
03582 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	LBS/DY	******	15 30DA AVG	30 DAILY MX	MG/L		WEEKLY	GRAB
FLOW, IN CONDUIT OR THRU TREATMENT PLANT	SAMPLE MEASUREMENT	.5725	2.6097	(03)	******	******	******		0		
50050 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	REPORT MO AVG	REPORT DAILY MX	MGD	******	******	******	*** ****		BASED ON ...	
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE		DATE		
	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to $10,000 and or maximum imprisonment of between 6 months and 5 years.)						
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)
5/10 hose leaking at 44 Bldg steep water tank at rail load out
5/13 cooling tower was contaminated and overflowed during a power outage

00398/971022-1550

Document No. 12

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)
NAME A. E. STALEY, DECATUR
ADDRESS 2200 EAST ELDORADO STREET
DECATUR IL 62525

FACILITY A. E. STALEY, DECATUR
LOCATION DECATUR IL 62525

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

(2-16) PERMIT NUMBER: IL0002781
(17-19) DISCHARGE NUMBER: 001 C

MONITORING PERIOD
FROM YEAR 98 MO 11 DAY 01 TO YEAR 98 MO 11 DAY 30
(20-21) (22-23) (24-25) (26-27) (28-29) (30-31)

STORM WATER RUNOFF (SPEE CO)
F - FINAL
MINOR
EFFLOS
*** NO DISCHARGE | | ***

June 98

Form Approved.
OMB No. 2040-0004
Approval expires 05-31-98
12345

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		QUANTITY OR LOADING (3 Card Only) (46-53) (54-61) AVERAGE	MAXIMUM	UNITS	QUANTITY OR CONCENTRATION (4 Card Only) (38-45) (46-53) (54-61) MINIMUM	AVERAGE	MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
BOD, 5-DAY (20 DEG. C)	SAMPLE MEASUREMENT	233	1736	(26)	******	******	******	(19)	5		
00310 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	150 30DA AVG	450 DAILY MX	LBS/DY	******	******	******	MG/L		WEEKLY	COMPOS
PH	SAMPLE MEASUREMENT	******	******		2.1	******	8.3	(12)	1		
00400 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	*** ***	6.0 MINIMUM	******	9.0 MAXIMUM	SU		WEEKLY	GRAB
SOLIDS, TOTAL SUSPENDED	SAMPLE MEASUREMENT	419	******	(26)	******	******	******	(19)	0		
00530 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	2000 30DA AVG	******	LBS/DY	******	******	******	MG/L		WEEKLY	COMPOS
OIL AND GREASE	SAMPLE MEASUREMENT	******	******	(26)	******	3	5	(19)	0		
03582 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	LBS/DY	******	15 30DA AVG	30 DAILY MX	MG/L		WEEKLY	GRAB
FLOW, IN CONDUIT OR THRU TREATMENT PLANT	SAMPLE MEASUREMENT	1.0057	1.7347	(03)	******	******	******		0		
50050 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	REPORT MO AVG	REPORT DAILY MX	MGD	******	******	******	*** ***		MEASRD DAY MO	
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to $10,000 and or maximum imprisonment of between 6 months and 5 years.)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: AREA CODE | NUMBER
DATE: YEAR | MO | DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

08/16/98 22:59 A.E.STALEY BLDG 134 → 217 421 4507 NO.007 D02

Document No. 13

PERMITTEE NAME/ADDRESS *(Include Facility Name/Location if Different)*

NAME A. E. STALEY, DECATUR
ADDRESS 2200 EAST ELDORADO STREET
DECATUR IL 62525

FACILITY A. E. STALEY, DECATUR
LOCATION DECATUR IL 62525

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

(2-16) IL0002381 PERMIT NUMBER
(17-19) C01 C DISCHARGE NUMBER

Form Approved. OMB No. 2040-0004 Approval expires 05-31-98

STORM WATER RUNOFF
(SUTR C4) 12305
F - FINAL
MINOR
EFFLUENT
*** NO DISCHARGE | | ***
NOTE: Read instructions before completing this form.

MONITORING PERIOD

	YEAR	MO	DAY		YEAR	MO	DAY
FROM	98	07	01	TO	98	07	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUANTITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
BOD, 5-DAY (20 DEG. C)	SAMPLE MEASUREMENT	37	114	(26)	******	******	******	(19)	0	135	CP
00310 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	150 30DA AVG	450 DAILY MX	LBS/DY	******	******	******	MG/L		WEEKLY	COMPOS
PH	SAMPLE MEASUREMENT	******	******		7.3	******	8.3	(12)	0	140	GR
00400 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	**** ****	6.0 MINIMUM	******	9.0 MAXIMUM	SU		WEEKLY	GRAB
SOLIDS, TOTAL SUSPENDED	SAMPLE MEASUREMENT	41	******	(26)	******	******	******	(19)	0	135	CP
00530 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	2000 30DA AVG	******	LBS/DY	******	******	******	MG/L		WEEKLY	COMPOS
OIL AND GREASE	SAMPLE MEASUREMENT	******	******	(26)	******	2	4	(19)	0	240	GR
03582 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	LBS/DY	******	15 30DA AVG	30 DAILY MX	MG/L		WEEKLY	GRAB
FLOW, IN CONDUIT OR THRU TREATMENT PLANT	SAMPLE MEASUREMENT	.2195	.5205	(03)	******	******	******		0	135	FI
50050 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	REPORT MO AVG	REPORT DAILY MX	MGD	******	******	******	**** ****		MEASRD WHN MN	
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and or maximum imprisonment of between 6 months and 5 years.)*

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE		
217	421-2842	98	08	
AREA CODE	NUMBER	YEAR	MO	DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*

00300/071990-1554

Document No. 14

:H was 13 +
From Friday 12/26/97
until Monday 12/29/97
6AM

WASTE TREATMENT REPORT

12/26/97 **AES TO SDD**

	FLOW GALLONS	UCL FLOW			Lbs TC	UCL Lbs TC	Lbs T.S.S.	UCL Lbs T.S.S.
12/26/97	4,562,600	7,000,000			11,470	18,000	9,201	10,000
10 DAY AVG.	4,521,170	5,500,000			9,879	16,000	6,669	15,000

	FLOW Gallons	TC mg/L AVG.	Lbs TC			T.S.S. (Mg/l)	Lbs T.S.S.	Sulfides Mg/L
WEST MN.	2,825,700	274	6451			254	5986	
22ND ST	914,000	541	4126			374	2851	
25TH ST.	822,900	130	893			53	364	0.012
				UCL Lbs TC			5AM H2S Grab	0.062
							7AM H2S Grab	0.004
MOSER LN	175,500	128	188	200		290	424	

pH excursions: Yes_____No_____Where:_____
Gravity Belt on Filtrate: Yes_____No_____
68 Ct. purge to West Main: Yes_____No_____
69 Ct. purge to West Main: Yes_____No_____

12/26/97	DAY SHIFT	NIGHT SHIFT	Total
TOTAL LBS TC TO SDD	6503	4967	11470
TOTAL FLOW (MM GAL)	2.369	2.194	4.563
TOTAL LBS TSS		9201	9201
WEST MAIN - LBS TC	3094	3357	6451
WEST MAIN - MM GAL	1.484	1.342	2.826
22ND ST. - LBS TC	3004	1121	4126
22ND ST. - MM GAL	0.480	0.434	0.914
25ND ST. - LBS TC	405	489	893
25ND ST. - MM GAL	0.404	0.419	0.823
19 EFFLUENT LBS TC	1130	1711	2841
19 EFFLUENT LBS TSS	826	1457	2283
19 BLDG. MLSS		6217	
123 EFFLUENT LBS TC	2510	4025	
123 EFFLUENT LBS TSS	1822	3881	
123 BLDG. MLSS		6684	
EAST EQ LEVEL	100	98	
EAST EQ TC - MG/L	2600	1880	
EAST EQ GPM OUT AVG	544	609	
lbs TC TO WASTE TREAT:	8500	6880	15380
WEST EQ LEVEL	90	80	
WEST EQ TC MG/L	2100	2020	
WEST EQ GPM	410	281	
69 TOWER TC MG/L (UCL 1739)	50	60	
68 TOWER TC MG/L (UCL 3636)	40	40	
54 CR SALT % LVL	25	0	
HYDROGEN PEROXIDE	3000	0	
DRY POLYMER BAGS	115	113	

WASTE TREATMENT REPORT

12/27/97 — **AES TO SDD**

	FLOW GALLONS	UCL FLOW			Lbs TC	UCL Lbs TC	Lbs T.S.S.	UCL Lbs T.S.S.
12/27/97	4,561,000	7,000,000			13,084	18,000	12,252	10,000
10 DAY AVG.	4,521,920	5,500,000			10,302	16,000	7,493	15,000

	FLOW Gallons	TC mg/L AVG.	Lbs TC			T.S.S. (Mg/l)	Lbs T.S.S.	Sulfides Mg/L
WEST MN.	3,147,900	381	9996			350	9189	
22ND ST	571,600	472	2250			594	2832	
25TH ST.	841,500	119	838			33	232	0.001
				UCL Lbs TC			5AM H2S Grab	0.036
							7AM H2S Grab	0.009
MOSER LN	173,400	359	519	200		289	418	

pH excursions: Yes_____No_____Where:_____
Gravity Belt on Filtrate: Yes_____No_____
68 Ct. purge to West Main: Yes_____No_____
69 Ct. purge to West Main: Yes_____No_____

12/27/97	DAY SHIFT	NIGHT SHIFT	Total
TOTAL LBS TC TO SDD	7318	5766	13084
TOTAL FLOW (MM GAL)	2.468	2.093	4.561
TOTAL LBS TSS		12252	12252
WEST MAIN - LBS TC	5502	4494	9996
WEST MAIN - MM GAL	1.692	1.456	3.148
22ND ST. - LBS TC	1407	843	2250
22ND ST. - MM GAL	0.331	0.241	0.572
25ND ST. - LBS TC	409	429	838
25ND ST. - MM GAL	0.446	0.396	0.842
19 EFFLUENT LBS TC	4733	2966	7698
19 EFFLUENT LBS TSS	7519	2787	10306
19 BLDG. MLSS		5224	
123 EFFLUENT LBS TC	4043	4663	
123 EFFLUENT LBS TSS	2608	2383	
123 BLDG. MLSS		6226	
EAST EQ LEVEL	90	26	
EAST EQ TC - MG/L	1790	1470	
EAST EQ GPM OUT AVG	886	811	
lbs TC TO WASTE TREAT:	9524	7162	16687
WEST EQ LEVEL	71	70	
WEST EQ TC MG/L	1830	1830	
WEST EQ GPM	388	296	
69 TOWER TC MG/L (UCL 1739)	50	70	
68 TOWER TC MG/L (UCL 3636)	60	60	
54 CR SALT % LVL	25	0	
HYDROGEN PEROXIDE	3000	0	
DRY POLYMER BAGS	115	115	

WASTE TREATMENT REPORT

12/28/97 — **AES TO SDD**

	FLOW GALLONS	UCL FLOW			Lbs TC	UCL Lbs TC	Lbs T S.S.	UCL Lbs T.S.S.
12/28/97	3,705,000	7,000,000			10,755	18,000	6,850	10,000
10 DAY AVG.	4,430,250	5,500,000			10,334	16,000	7,853	15,000

	FLOW Gallons	TC mg/L AVG.	Lbs TC			T.S.S. (Mg/l)	Lbs T.S.S.	Sulfides Mg/L
WEST MN.	2,341,300	393	7666			251	4901	
22ND ST	510,600	385	1640			304	1295	
25TH ST.	853,100	204	1448			92	655	N/S
				UCL Lbs TC			5AM H2S Grab	0.022
							7AM H2S Grab	0.054
MOSER LN	159,900	206	275	200		216	288	

pH excursions: Yes_____No_____Where:_____
Gravity Belt on Filtrate: Yes_____No_____
68 Ct. purge to West Main: Yes_____No_____
69 Ct. purge to West Main: Yes_____No_____

12/28/97	DAY SHIFT	NIGHT SHIFT	Total
TOTAL LBS TC TO SDD	5465	5290	10755
TOTAL FLOW (MM GAL)	1.501	2.204	3.705
TOTAL LBS TSS		6850	6850
WEST MAIN - LBS TC	3787	3879	7666
WEST MAIN - MM GAL	0.841	1.500	2.341
22ND ST. - LBS TC	776	864	1640
22ND ST. - MM GAL	0.245	0.266	0.511
25ND ST. - LBS TC	901	547	1448
25ND ST. - MM GAL	0.416	0.438	0.853
19 EFFLUENT LBS TC	734	1464	2198
19 EFFLUENT LBS TSS	432	1356	1789
19 BLDG. MLSS		4403	
123 EFFLUENT LBS TC	3468	4353	
123 EFFLUENT LBS TSS	1677	2238	
123 BLDG. MLSS		6467	
EAST EQ LEVEL	43	28	
EAST EQ TC - MG/L	1500	1260	
EAST EQ GPM OUT AVG	555	1143	
lbs TC TO WASTE TREAT:	4998	8645	13643
WEST EQ LEVEL	77	28	
WEST EQ TC MG/L	2000	2000	
WEST EQ GPM	356	329	
69 TOWER TC MG/L (UCL 1739)	70	50	
68 TOWER TC MG/L (UCL 3636)	60	50	
54 CR SALT % LVL	20	20	
HYDROGEN PEROXIDE	3200	2600	
DRY POLYMER BAGS	80	89	

WASTE TREATMENT REPORT

12/29/97 — **AES TO SDD**

	FLOW GALLONS	UCL FLOW			Lbs TC	UCL Lbs TC	Lbs T.S.S.	UCL Lbs T.S.S.
12/29/97	4,040,800	7,000,000			8,528	18,000	7,475	10,000
10 DAY AVG.	4,247,910	5,500,000			10,011	16,000	7,825	15,000

	FLOW Gallons	TC mg/L AVG.	Lbs TC			T.S.S. (Mg/l)	Lbs T.S.S.	Sulfides Mg/L
WEST MN.	2,613,300	280	6096			250	5449	
22ND ST	535,500	360	1610			322	1438	
25TH ST.	892,000	111	822			79	588	0.003
				UCL Lbs TC			5AM H2S Grab	0.014
							7AM H2S Grab	0.004
MOSER LN	152,300	138	175	200		183	232	

pH excursions: Yes_____No_____Where:_____
Gravity Belt on Filtrate: Yes_____No_____
68 Ct. purge to West Main: Yes_____No_____
69 Ct. purge to West Main: Yes_____No_____

12/29/97	DAY SHIFT	NIGHT SHIFT	Total
TOTAL LBS TC TO SDD	4057	4471	8528
TOTAL FLOW (MM GAL)	1.786	2.255	4.041
TOTAL LBS TSS		7475	7475
WEST MAIN - LBS TC	2957	3139	6096
WEST MAIN - MM GAL	1.108	1.505	2.613
22ND ST. - LBS TC	748	862	1610
22ND ST. - MM GAL	0.256	0.279	0.536
25ND ST. - LBS TC	352	471	822
25ND ST. - MM GAL	0.422	0.470	0.892
19 EFFLUENT LBS TC	1121	1473	2594
19 EFFLUENT LBS TSS	496	975	1471
19 BLDG. MLSS		4658	
123 EFFLUENT LBS TC	3684	2410	
123 EFFLUENT LBS TSS	1684	1104	
123 BLDG. MLSS		6036	
EAST EQ LEVEL	46	15	
EAST EQ TC - MG/L	1400	1140	
EAST EQ GPM OUT AVG	638	449	
lbs TC TO WASTE TREAT:	5364	3077	8441
WEST EQ LEVEL	33	39	
WEST EQ TC MG/L	1400	1950	
WEST EQ GPM	381	298	
69 TOWER TC MG/L (UCL 1739)	60	80	
68 TOWER TC MG/L (UCL 3636)	60	70	
54 CR SALT % LVL	20	20	
HYDROGEN PEROXIDE	2800	2500	
DRY POLYMER BAGS	76	85	

Document No. 15

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

Received 1/14/98 Dmp.

January 7, 1998

Mr. Derek Paszkiewicz
A.E. Staley
2200 East Eldorado
Decatur, IL 62525

Incident Verification Letter
Re: Incident #980002

Dear Mr. Paszkiewicz:

On January 2, 1998 this office received information that you or an organization that you represent were involved in an environmental incident which occurred at or near 2200 East Eldorado in Decatur on or before December 26, 1997. Our records currently indicate the involvement of an unknown amount of sodium hydroxide.

Your assistance is requested in confirming, correcting and completing the public records regarding the circumstances of this incident. Enclosed is a copy of the Illinois Emergency Management Agency's report as we received it. Please make additions and any corrections as needed and return it within ten (10) working days from receipt of this letter. Include with your submission a description of the emergency actions taken at the time of the release and if appropriate what additional remediation has taken place or is planned. If cleanup and disposal have not been completed when you submit the 10-day report, include with this report an estimated time schedule for completing such actions. Upon completion, please submit a final report showing how cleanup and disposal were done. Make your reply to:

Illinois Environmental Protection Agency
Emergency Response Unit, Mail Drop #29
P.O. Box 19276
Springfield, IL 62794-9276

or

FAX: 217/524-4036

Please refer to the incident number in all correspondence on this incident. Should you have any questions concerning the incident verification please contact the undersigned at 217/782-3637.

Sincerely,

Charles W Brutlag

Charles W. Brutlag, Incident Coordinator
Emergency Response Unit

CWB:iv

cc: Incident File

Printed on Recycled Paper

Illinois Emergency Management Agency

Incident Number 9 8 0 0 0 2

FIELD REPORT

Notify: ILLINOIS EMERGENCY MANAGEMENT AGENCY
1 – 800 / 782 – 7860 or 217 / 782 – 7860

Date: 01 / 02 / 98
Time: 0903
Received by: IH

1. Caller: DEREK PASZKIEWICZ
2. Call back phone#: 217/421-2298
3. Caller represents: A.E. STALEY
4. Type of incident: [ ] Fire [X] Leak or Spill
   [ ] Explosion [ ] Water Involvement
   [ ] Gas or Vapor cloud [ ] Other
5. Incident Location:
   Street 2200 E. ELDORADO
   City DECATUR 115 [X] In [ ] Near
   County MACON 115
   Milepost ____ [ ] RR [ ] River [ ] Highway
   Sec. ____ Twp. ____ Range ____
6. Area Involved: [ ] Highway [ ] Rail [X] Fixed Facility
   [X] Waterway [ ] Air [X] Other SEWER/LAKE DECATUR
7. Material (s) Involved: SODIUM HYDROXIDE

   [ ] Gas [X] Liquid [ ] Semi-Solid [ ] Solid
   [ ] Pesticide [ ] Radioactive
   CAS #: 001310732
   UN/NA #: UNK
   Is this a 302 (a) Extremely Hazardous Substance?
   [ ] Yes [X] No [ ] Unknown
   Is this a RCRA Hazardous Waste?
   [ ] Yes [ ] No [ ] Unknown
   If Yes, is this a RCRA regulated facility?
   [ ] Yes [ ] No
8. Container: [ ] Truck [ ] RR car [ ] Drum
   [X] Aboveground tank [ ] Pipeline
   [ ] Underground tank [ ] Other
   container size: UNK
9. Amount released: UNK
   Rate of release: ____ / min.
10. Cause of release: EMPLOYEE ERROR

11. Estimated spill extent: NA
    [ ] square feet [ ] square yards
12. [ ] Occurred Date: ___/___/___ Time: ____
    [X] Discovered Date: 12 / 26 / 97 Time: PM

13. Emergency units contacted -0-
    [ ] Fire
    [ ] Sheriff
    [ ] Police
    [ ] ESDA
    [ ] Other

    On scene
    [ ] Fire
    [ ] Sheriff
    [ ] Police
    [ ] ESDA
    [ ] Other

14. On Scene Contact: #1
    On Scene Phone#: #2
15. No. injured: -0- [ ] Haz-mat related
    Where taken:
16. Public health risks and/or precautions taken, including # evacuated: -0-
    NO ENVIRONMENTAL CONCERNS WITH LAKE
17. Assistance needed from State Agencies:
    -0-
18. Containment/cleanup actions and plans:
    SODINE HELPED WITH CLEANUP/RAN SUMP PUMPS TO SUCK MATERIAL OUT OF SEWER
19. Weather: [ ] sunny [ ] overcast [ ] night
    [ ] ptly. cldy. [ ] rain [ ] snow
    Temp. ____ F wind dir. ____ speed ____ mph.
20. Responsible Party: #3
    Contact person: #1
    Phone # #2
    Mailing address: #5 62525

Notifications: 0914 FAXED IEPA/IDPH/REG 7

Document No 16

A.E. STALEY MANUFACTURING COMPANY 2200 E. ELDORADO STREET DECATUR, ILLINOIS 62525 TELEPHONE 217/423-4411

January 23, 1998

Illinois Environmental Protection Agency
Emergency Response Unit, Mail Drop #29
P.O. Box 19276
Springfield, IL 62794-9276

Reference: Incident Verification Letter
10-Day Report
Incident No.: 980002

Dear Mr. Brutlag:

Please find enclosed a copy of the 10-Day follow up report that you requested for IMEA's field report of the above referenced incident. If you have any further questions, feel free to contact me at 217-421-2298.

Sincerely,

Derek Paszkiewicz
Utility Production Engineer

cc. Dick Dickinson, Staley

Illinois Emergency Management Agency

Incident Number [9][8][0][0][0][2]

FIELD REPORT

Notify: ILLINOIS EMERGENCY MANAGEMENT AGENCY
1 – 800 / 782 – 7860 or 217 / 782 – 7860

Date: 01 / 02 / 98
Time: 0903
Received by: TH

1. Caller: DEREK PASZKIEWICZ
2. Call back phone#: 217/421-2298
3. Caller represents: A.E. STALEY
4. Type of incident: [ ] Fire [X] Leak or Spill
   [ ] Explosion [ ] Water Involvement
   [ ] Gas or Vapor cloud [ ] Other
5. Incident Location:
   Street 2200 E. ELDORADO
   City DECATUR 115 [X] In [ ] Near
   County MACON 115
   Milepost ____ [ ] RR [ ] River [ ] Highway
   Sec. ____ Twp. ____ Range ____
6. Area Involved: [ ] Highway [ ] Rail [X] Fixed Facility
   [X] Waterway [ ] Air [X] Other SEWER/LAKE DECATUR
7. Material (s) Involved: SODIUM HYDROXIDE
   [ ] Gas [X] Liquid [ ] Semi-Solid [ ] Solid
   [ ] Pesticide [ ] Radioactive
   CAS #: UNK 001310732
   UN/NA #: UNK
   Is this a 302 (a) Extremely Hazardous Substance?
   [ ] Yes [X] No [ ] Unknown
   Is this a RCRA Hazardous Waste?
   [ ] Yes [ ] No [ ] Unknown
   If Yes, is this a RCRA regulated facility?
   [ ] Yes [ ] No
8. Container: [ ] Truck [ ] RR car [ ] Drum
   [X] Aboveground tank [ ] Pipeline
   [ ] Underground tank [ ] Other
   container size: UNK
9. Amount released: UNK
   Rate of release: ____ / min.
10. Cause of release: EMPLOYEE ERROR
11. Estimated spill extent: NA
    [ ] square feet [ ] square yards
12. [ ] Occurred Date: ___ / ___ / ___ Time: ____
    [X] Discovered Date: 12 / 26 / 97 Time: PM

14. On Scene Contact: #1
    On Scene Phone#: #2
15. No. injured: -0- [ ] Haz-mat related
    Where taken: ____
16. Public health risks and/or precautions taken, including # evacuated: -0-
    NO ENVIRONMENTAL CONCERNS WITH LAKE
17. Assistance needed from State Agencies: -0-
18. Containment/cleanup actions and plans:
    IODINE HELPED WITH CLEANUP/RAN SUMP PUMPS TO SUCK MATERIAL OUT OF SEWER
19. Weather: [ ] sunny [ ] overcast [ ] night
    [ ] pdy. cldy. [ ] rain [ ] snow
    Temp. ____ F wind dir. ____ speed ____ mph
20. Responsible Party: #3
    Contact person: #1
    Phone # #2
    Mailing address: #5 62525

Notifications: 0914 FAXED IEPA/IDPH/REG 7

13. Emergency units contacted -0-
    [ ] Fire ____
    [ ] Sheriff ____
    [ ] Police ____
    [ ] ESDA ____
    [ ] Other ____

On scene
[ ] Fire ____
[ ] Sheriff ____
[ ] Police ____
[ ] ESDA ____
[ ] Other ____

Additions and/or Corrections to the Illinois Emergency Management Agency's Report for Incident No. 980002.

Section 8

Container:	Aboveground Tank
Container Size:	8000 gallons

Section 9

Amount Released:	approx. 600 gallons
Rate of Release:	approx. 100 gph

Summary of Release:

On December 26, 1997, approximately 600 gallons of 50% NaOH solution was released to the A. E. Staley Decatur Plant's storm sewer system. This released material contaminated approximately 600,000 gallons of storm water that was detained by a storm water check dam located in the sewer. During the subsequent 62 hours, roughly 100,000 gallons of high pH storm water overflowed the storm sewer check dam and was discharged to Lake Decatur. Another 500,000 gallons was diverted to the Staley Lake (an onsite fire water reservoir) to prevent further contamination of Lake Decatur. This was accomplished by pumping the remaining high pH storm water detained by the check dam into an overland drainage channel that feeds Staley Lake. Based on this information, it is estimated that 720 lbs. of sodium hydroxide was discharged to the Moser Lane sewer and then to Lake Decatur. The remaining 3110 lbs. of sodium hydroxide was diverted to Staley Lake where it was diluted and neutralized.

Document No. 17

I. PURPOSE

It is the stated intent of A. E. Manufacturing Company's Decatur, Illinois facility to manage spills generated by facility activities in a manner that is designed to minimize hazards to human health or the environment.

This "Spill Prevention, Control and Countermeasure Plan" complies with EPA 40 CFR 112 and Decatur Sanitary District requirements to insure A. E. Staley Manufacturing will effectively respond to any spill emergency. In addition, this Plan serves as a personnel training document to educate employees involved in the handling of, proper spill management of, and emergency procedures associated with hazardous materials, oil and process upsets.

Area Managers are responsible for notifying the Plant Environmental Engineer of any significant changes to these plans. These changes will then be incorporated into the Decatur Facility Plan. The Plan is immediately amended whenever any of the following occur:

- ☐ Applicable regulations are revised;
- ☐ The Plan fails in an emergency, including major sewer loss;
- ☐ Spill potentials are changed due to equipment or process revisions.
- ☐ Names of Personnel designated as Emergency Coordinators changes;
- ☐ Types of emergency equipment used changes.

This plan has been certified by:

	SIGNATURE	DATE
Michael J. Slimbarski Plant Manager	M J Slimbarski	12-26-97
Debby Witts Plant Environmental Engineer	Debby Witts	12-23-97
Lynn W. Elder Manager, Energy Purchases and Professional Engineer	Lynn W. Elder	12/23/97